

EXHIBIT 2



November 15, 2013

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VIA ELECTRONIC MAIL

Dear Counsel,

EarthRights International (ERI) has learned that Chevron is seeking documents pertaining to ERI and its work on matters relating to the Lago Agrio litigation, including possible attorney work product, pursuant to its subpoena on Donald Moncayo.

Because such documents may include protected work product, we seek your agreement that we will have the opportunity to review any responsive documents relating to ERI, and that documents identified as privileged by ERI will not be produced, as follows:

1. A compilation of any and all documents that contain the search terms "EarthRights," "Earth /3 Rights," or "ERI," shall be furnished to ERI in the same format as it would be produced, prior to production. Documents containing the search term "Marissa OR Marisa" which are dated prior to September 1, 2013, shall be similarly furnished to ERI. (Attorney Marissa Vahlsing was a legal fellow with EarthRights International for two years until September 2013, and worked on matters relating to the Lago Agrio litigation.)
2. ERI shall have 24 hours to review these documents prior to production. If the responsive documents for this subset of search terms comprise greater than 500 pages, at least an additional 24 hours will be provided for review.
3. If this requires any change in the time period for production, that is a matter to be worked out between Chevron and Mr. Moncayo.
4. ERI shall have the opportunity to submit a privilege log to counsel for Mr. Moncayo and counsel for Chevron prior to production.

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5. Any documents identified as privileged by ERI shall not be produced by Mr. Moncayo at this time.

Please inform me of your position by the end of the day today. If necessary, we will seek relief from the Court. I note that ERI had, previously, requested notification from Gibson Dunn of subpoenas that seek documents relating to ERI; we are disappointed that, as a matter of professional courtesy, this was not done.

Sincerely,

/s/ Richard Herz
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